

February 28, 2023

By ECF

Hon. P. Kevin Castel
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Miller et al. v. City of New York et al.*, 21 Civ. 2616 (PKC)

Dear Judge Castel:

Together with Alexander Reinert, this firm represents the Plaintiffs in this putative class action. The next conference in this case is scheduled for April 13, 2023.

We are pleased to report that the parties have now resolved all the outstanding substantive issues in their settlement negotiations. Counsel are awaiting the production of certain medical information from non-party NYC Health + Hospitals, and the final version of the forthcoming comprehensive settlement agreement (which is approximately 50 pages long) needs to be formally approved by the Corporation Counsel and the Comptroller. Counsel for the parties expect to be able to execute the settlement agreement within the next two weeks to be able to move the Court for conditional approval by March 30, 2023.

Respectfully submitted,



John R. Cuti